

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI**

**IN RE: PATRICIA BELL MACK
 , Debtor(s)**

**Case No. 17-02977-EE
CHAPTER 13**

NOTICE

Patricia Bell Mack has/have filed papers with the court to Modify his/her Chapter 13 Bankruptcy Plan.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the court to amend the Plan, or if you want the court to consider your views on the Motion, then on or before November 22, 2017, you or your attorney must:

File with the court a written request for a hearing at:

U.S. Bankruptcy Clerk
U.S. Bankruptcy Court
P.O. Box 2448
Jackson, MS 39225-2448

If you mail your request to the court for filing, you must mail it early enough so the court will **receive** it on or before the date state above.

You must also mail a copy to the debtors' attorney:

Thomas C. Rollins, Jr.
The Rollins Law Firm, PLLC
P.O. Box 627
Ridgeland, MS 39158-0627
(601) 500-5533

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion and may enter an order granting that relief, which shall sustain this Motion to Modify Plan.

Date: November 1, 2017

Signature: /s/ Thomas C. Rollins, Jr.
Thomas C. Rollins, Jr. (MSBN 103469)
The Rollins Law Firm, PLLC
774 Avery Blvd. N, Ste. D
Ridgeland, MS 39157

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI**

**IN RE: PATRICIA BELL MACK
, Debtor(s)**

**Case No. 17-02977-EE
CHAPTER 13**

MOTION TO MODIFY BANKRUPTCY PLAN

COME NOW, Debtors, by and through counsel, and move this Court to modify their Chapter 13 plan, and in support thereof, would show the Court as follows:

I.

Debtors commenced this case on August 15, 2017 by filing a voluntary petition for relief under Chapter 13 of Title 11 of the United States Bankruptcy Code.

II.

The following changes should made their chapter 13 plan:

1. Plan should be modified to reduce the distribution to general unsecured creditors to 5%.
2. The trustee should reduce the plan payments to reflect the debtor's monthly net income or a higher amount if necessary to pay a 5% distribution to unsecured creditors.

WHEREFORE, Debtor prays that his/her Bankruptcy Plan be modified to reflect the above-mentioned changes and for such additional or alternative relief as may be just and proper.

Respectfully submitted

/s/ Thomas C. Rollins, Jr.
Thomas C. Rollins, Jr. (MS Bar No. 103469)

Of Counsel:
Thomas C. Rollins, Jr.
The Rollins Law Firm, PLLC
P.O. Box 627
Ridgeland, MS 39158
601-500-5533

CERTIFICATE OF SERVICE

I, Thomas C. Rollins, Jr., do hereby certify that a true and correct copy of the above Motion to Modified Plan was forwarded on November 1, 2017, to the creditor, case trustee and U.S. Trustee as indicated in the "21 day notice" that accompanies this Objection.

/s/ Thomas C. Rollins, Jr.
Thomas C. Rollins, Jr.

CERTIFICATE OF SERVICE

I, Thomas C. Rollins, Jr., do hereby certify that a true and correct copy of the above and foregoing Notice and Motion to Modify Plan was forwarded on November 1, 2017, to:

By Electronic CM/ECF Notice:

James Henley

U.S. Trustee

/s/ Thomas C. Rollins, Jr.
Thomas C. Rollins, Jr.